

---

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

---

**HANNAH PAISLEY ZOULEK, et al,**

**Plaintiffs,**

**v.**

**SEAN D. REYES, in his official  
capacity as Attorney General of Utah,**

**KATHERINE HASS, in her official  
capacity as Director of the Division of  
Consumer Protection of the Utah  
Department of Commerce,**

**Defendants.**

**JOINT NOTICE AND PROPOSED  
AMENDED SCHEDULING ORDER**

**Case No. 2:24-cv-00031-DAK-DAO**

**Judge Dale A. Kimball**

**Magistrate Judge Daphne A. Oberg**

---

Plaintiffs Hannah Paisley Zoulek, Jessica Christensen, Lu Ann Cooper, and Val Snow, and Defendants Sean D. Reyes and Katherine Hass, in their official capacities, submit this Joint Notice and Proposed Amended Scheduling Order pursuant to this Court's January 29, 2024 Order. ECF No. 27.

The parties met and conferred on March 12, 2024. The Utah Legislature has passed new legislation that would repeal and replace Utah's Social Media Regulation Act, which is the subject of Plaintiffs' live complaint. ECF No. 2. The effective date of this new legislation is October 1, 2024. This new legislation is awaiting the Governor's approval, and the Governor is expected to approve. If the Governor approves legislation repealing and replacing the Social Media Regulation Act, the parties agree that Plaintiffs should amend their Complaint.

Consequently, the parties jointly propose the following amended scheduling order:

Plaintiffs' First Amended Complaint and Motion for Preliminary Injunction (if any) Due	<b>May 31, 2024</b>
----------------------------------------------------------------------------------------------	---------------------

Defendants' Combined Opposition to Plaintiff's Motion for Preliminary Injunction <i>and</i> Motion to Dismiss (if any)	<b>June 28, 2024</b>
------------------------------------------------------------------------------------------------------------------------------	----------------------

Plaintiffs' Combined Reply in Support of **July 26, 2024**  
Motion for Preliminary Injunction *and*  
Opposition to Defendants' Motion to  
Dismiss

Defendants' Reply in Support of Motion to **August 9, 2024**  
Dismiss

Hearing on Plaintiffs' Motion for **At the Court's convenience**  
Preliminary Injunction and Defendants'  
Motion to Dismiss

RESPECTFULLY SUBMITTED this 15 day of March, 2024.

/s/ David N. Wolf  
Lance Sorenson  
David Wolf  
*Counsel for Defendants*

Ambika Kumar\*  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104

Adam S. Sieff\*  
DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
Los Angeles, California 90017

David M. Gossett\*  
Chelsea T. Kelly\*  
DAVIS WRIGHT TREMAINE LLP  
1301 K Street NW, Suite 500 East  
Washington, D.C. 20005

\*admitted *pro hac vice*

*Attorneys for Plaintiffs*

/s/ Robert Corn-Revere  
Robert Corn-Revere\*  
FOUNDATION FOR INDIVIDUAL RIGHTS  
AND EXPRESSION  
700 Pennsylvania Avenue SE, Suite 340  
Washington, D.C. 20003

Kelley Bregenzer\*  
FOUNDATION FOR INDIVIDUAL RIGHTS  
AND EXPRESSION  
510 Walnut St. Suite 900  
Philadelphia, PA 19106

Jerome H. Mooney (Utah Bar #2303)  
WESTON, GARROU & MOONEY  
50 West Broadway, Suite 300  
Salt Lake City, Utah 84101

**CERTIFICATE OF SERVICE**

I hereby certify that on **March 15, 2024**, the foregoing **JOINT NOTICE AND PROPOSED AMENDED SCHEDULING ORDER** was filed using the court's electronic filing system. I further certify that a true and correct copy was served, via email, to the following:

**Jerome H. Mooney**  
WESTON GARROU & MOONEY  
[Jerryym@mooneylaw.com](mailto:Jerryym@mooneylaw.com)

**Adam Sieff**  
**Ambika Kumar**  
**Chelsea T. Kelly**  
**David M. Gossett**  
DAVIS WRIGHT TREMAINE, LLP  
[adamsieff@dwt.com](mailto:adamsieff@dwt.com)  
[ambikakumar@dwt.com](mailto:ambikakumar@dwt.com)  
[davidgossett@dwt.com](mailto:davidgossett@dwt.com)

**Kelley Bregenzer**  
**Robert Corn-Revere**  
FOUNDATION FOR INDIVIDUAL RIGHTS AND EXPRESSION  
[bobcornrevere@dwt.com](mailto:bobcornrevere@dwt.com)

*Attorneys for Plaintiffs*

UTAH ATTORNEY GENERAL'S OFFICE

/s/ Seth A. Huxford  
SETH A. HUXFORD  
*Legal Secretary*